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SOAH DOCKET NO. 473-21-0538
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APPLICATION OF SOUTHWESTERN §
ELECTRIC POWER COMPANY FOR §
AUTHORITY TO CHANGE RATES §
BEFORE THE STATE OFFICE
OF
ADMINISTRATIVE HEARINGS

**SOUTHWESTERN ELECTRIC POWER COMPANY'S RESPONSE TO COMMISSION
STAFF'S SEVENTH REQUEST FOR INFORMATION**

JANUARY 14, 2021

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Staff_7-1_Attachment_1.xlsx

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SOUTHWESTERN ELECTRIC POWER COMPANY'S RESPONSE TO COMMISSION
STAFF'S SEVENTH REQUEST FOR INFORMATION

Question No. Staff 7-1:

Regarding the SWEPCO Forestry Right-of-Way (ROW) Widening program, please answer the following:

- a) Please explain and provide the dollar amount of the expenses from this project that were incurred for the rebuilding, reconductoring, or upgrading of existing transmission facilities and provide the amount that was used for the clearing of additional ROW, if any.
- b) Please explain and provide the dollar amount of the expenses from this project that were incurred in association with or for new transmission facilities.
- c) Please explain why the expenses from this project were not included in the original ROW clearing for facilities.
- d) If these vegetation management expenses were incurred for existing lines, please provide documentation showing the dates the expenses were incurred for the existing transmission lines and the date those existing lines were energized. Please provide the information per transmission line.
- e) To which FERC account were the expenses charged?
- f) Please describe in detail how the company keeps track of specific vegetation management that SWEPCO categorizes as a capital expense under this project and how the company keeps track of specific vegetation management that it categorizes as O&M.
- g) How is this accomplished if the transmission facilities are not new facilities?
- h) How do personnel in the field differentiate these activities (capital vegetation management versus O&M vegetation management) when they perform the work? Are both types of vegetation management performed at the same time by the same personnel or are they assigned as different jobs which are performed separately?

Response No. Staff 7-1:

- a) The SWEPCO Forestry Right-of-Way (ROW) Widening program was identified in Staff 2-13 Attachment 1 as Project TREESSWEP, and the project details were provided in rows 2,526 through 3,084. The total project cost was provided in row 3,084 as \$2,737,054. None of the dollars from this project were incurred for rebuilding, reconductoring, upgrading existing transmission facilities or for new transmission facilities. These dollars were spent to expand existing ROW and to remove hazard trees.

As noted on pages 40-41 of Mr. Baird's direct testimony, none of these costs were included in invested capital in this case. As Mr. Baird explains, SWEPCO capitalizes certain vegetation management costs on a company-wide basis since Texas is the only jurisdiction that disallows this practice. However, for purposes of this case, SWEPCO wrote off the Texas share of the capitalized amount and recorded the write-off to FERC Account 116 to offset the amount recorded to plant in service. SWEPCO witness Mr. Aaron directly assigned these FERC Account 116 balances to reduce the SWEPCO Texas retail rate base, resulting in exclusion of these capitalized vegetation management costs from SWEPCO's rate base in this proceeding.

- b) See the response to subpart (a).
- c) The dollars spent in this project are for existing lines, and the costs were not part of the ROW clearing that occurred during the initial construction of these facilities. These costs are not included in SWEPCO's rate base in this case as explained in the response to subpart (a).
- d) See Staff 7-1 Attachment 1.
- e) Per the Commission's decision in Docket No. 46449, the dollars spent on this project are not capitalized to plant in service. Instead, they are treated as O&M for SWEPCO's Texas jurisdiction (all other SWEPCO jurisdictions treat this project as capital). The O&M account is 571. Please see the response to subpart (a) and Michael A. Baird's Direct Testimony, pages 40 and 41, for additional information.
- f) Please see the response to subpart (a) and Michael A. Baird's Direct Testimony, pages 40 and 41.
- g) Only existing facility ROW widening are charged to this project. All other activity is charged to different projects.
- h) As discussed above in the response to subpart (a) and in Mr. Baird's Direct Testimony, an adjustment is made for Texas so that no vegetation management costs for existing lines are capitalized. SWEPCO field personnel track costs related to the Forestry ROW Widening program to differentiate the Texas portion of the costs such that these costs are ultimately charged to O&M.

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**SWEP Co Transmission
Line In-Service Dates**

ASSET_LOCATION	Asset_Loc_ID	OPCo	1st_Yr_Added_To_Plant	eng_in_service
(Radial) Beckville - Carthage - Center 69KV Line : SEP : TL202	TL202	SEP	1926	12/31/1926
(Radial) Logansport - Stanley Tap 69KV Line : SEP : TL108	TL108	SEP	1948	12/31/1948
(Radial) Patterson - Nekoosa - Edwards 69KV Line : SEP : TL168	TL168	SEP	1968	12/31/1968
(Radial) Red Point - Bellevue (Getty Oil) 69KV Line : SEP : TL124	TL124	SEP	1972	12/31/1971
(Radial) Red Point - Dogwood - Bellevue - Bellevue Oilfield (Bremco) 69KV Line : SEP : TL104	TL104	SEP	1997	12/31/1997
Abbott Tee - Waldron 69KV Line : SEP : TL142	TL142	SEP	1961	12/31/1961
AP&L - Patterson - Jefferson Switching Station - Marshall - Knox Lee - Overton 138KV Line : SEP : TL241	TL241	SEP	1942	12/31/1942
Atlanta - Hughes Springs 69KV Line : SEP : TL201	TL201	SEP	1926	12/31/1926
Belmont - Marthaville 69kv Line : SEP : TL353	TL353	SEP	2010	10/2/2010
Bloomburg - Atlanta 69KV Line : SEP : TL203	TL203	SEP	1926	12/31/1926
Center - Powell Street - Tap - Panola Harrison Rural Electric Association 69KV Line : SEP : TL112	TL112	SEP	1948	12/31/1948
Centerton - Rogers 69KV Line : SEP : TL161	TL161	SEP	1957	12/31/1957
Chambers Spring - Tontitown 345KV Line : SEP : TL288	TL288	SEP	2003	8/31/2003
Childress - Shamrock - Gray County Line Interconnect 138KV Line : SEP : TL294	TL294	SEP	2007	2/1/2007
Clarksville - Perdue - Gilmer 69kv Line : SEP : TL206	TL206	SEP	1950	12/31/1950
DeQueen - Craig Junction 138KV Line (AR Portion) : SEP : TL159	TL159	SEP	1927	12/31/1927
Diana - Perdue 138KV Line : SEP : TL238	TL238	SEP	1972	12/31/1972
Diana - Pirkey - GSU Interconnect 345KV Line : SEP : TL273	TL273	SEP	1981	12/31/1981
Diana - Welsh (West Circuit) 345KV Line : SEP : TL275	TL275	SEP	1976	12/31/1976
Dixie Tee - North Benton - Red Point 138KV Line : SEP : TL132	TL132	SEP	1953	12/31/1953
Dixie Tee (Disconnected) - Belcher - Texarkana Plant 69KV Line (AR) : SEP : TL151	TL151	SEP	1926	12/31/1926
Dixie Tee (Disconnected) - Belcher - Texarkana Plant 69KV Line : SEP : TL111	TL111	SEP	1926	12/31/1926
Dolet Hills - SW Shreveport 345KV Line : SEP : TL133	TL133	SEP	1984	12/31/1984
Dyess - Beaver Dam 161KV Line : SEP : TL189	TL189	SEP	1961	12/31/1961
East Leesville - Hicks 69kv Line : SEP : TL347	TL347	SEP	2010	10/2/2010
Eureka Springs - AP&L Interconnection 161KV Line : SEP : TL188	TL188	SEP	1969	12/31/1969
Fayetteville - Van Asche 161KV Line : SEP : TL342	TL342	SEP	2008	4/11/2008
Flint Creek - Dyess Substation 161KV Line : SEP : TL177	TL177	SEP	1930	12/31/1930
Flint Creek - Shipe Road 345kv Line : SEP : TL344	TL344	SEP	2014	4/3/2014
Flint Creek - South Fayetteville Substation 161KV Line : SEP : TL179	TL179	SEP	1975	12/31/1975
Flint Creek West - Arkansas - Oklahoma 345KV Line (AR) : SEP : TL149	TL149	SEP	1984	12/31/1984
Flournoy - Pines Road - Hardy St 69KV Line : SEP : TL125	TL125	SEP	1970	12/31/1970
Gilliam - Marshall 69KV Line : SEP : TL113	TL113	SEP	1928	12/31/1928
Gilliam - Marshall With Tap - Karnack Plant 69KV Line : SEP : TL205	TL205	SEP	1929	12/31/1929
Gladewater - Greggton - Lake Lamond - Longview Heights - Marshall 69KV Line : SEP : TL208	TL208	SEP	1926	12/31/1926
Hosston - Plain Dealing - North Benton 69KV Line : SEP : TL102	TL102	SEP	1951	12/31/1951
Hughes Springs - Mt Pleasant 69KV Line : SEP : TL209	TL209	SEP	1948	12/31/1948
Huntington - Waldron 69KV Line : SEP : TL139	TL139	SEP	See Note 1	See Note 1
Jefferson Switching Structure - Lieberman 138KV Line : SEP : TL126	TL126	SEP	1949	12/31/1949
Knox Lee - Perdue 138KV Line : SEP : TL237	TL237	SEP	1974	12/31/1974
Knox Lee - Whitney - Marshall 138KV Line : SEP : TL243	TL243	SEP	1948	12/31/1948
Lebrock - Pirkey 345KV Line : SEP : TL281	TL281	SEP	2003	3/25/2003
Leiberman - Blanchard - North Market 69KV Line : SEP : TL121	TL121	SEP	1962	12/31/1962
Leiberman - Superior - Vivian - Hosston 69KV Line : SEP : TL117	TL117	SEP	1953	12/31/1953
Logansport - Rock Hill (TX) 138KV Line : SEP : TL230	TL230	SEP	1969	12/31/1969
Lone Star South - Pittsburg 138KV Line : SEP : TL220	TL220	SEP	1957	12/31/1957
Longwood - Scottsville 138kv Line : SEP : TL336	TL336	SEP	2020	5/5/2020
LP&L Intercon-Longwood-Wilkes-Welsh-Lydia-PSO Intercon 345KV Line (LA) : SEP : TL135	TL135	SEP	1968	12/31/1968
LP&L Intercon-Longwood-Wilkes-Welsh-Lydia-PSO Intercon 345KV Line (TX) : SEP : TL271	TL271	SEP	1969	12/31/1969
Lydia - North West Texarkana Substation 345KV Line : SEP : TL270	TL270	SEP	1977	12/31/1977
Many - Belmont 69kv Line : SEP : TL349	TL349	SEP	2010	10/2/2010
Many - Negreet 69kv Line : SEP : TL350	TL350	SEP	2010	10/2/2010
Marshall - Longwood - Arsenal Hill - Longwood - Lieberman 138KV Line (LA Section) : SEP : TL127	TL127	SEP	1931	12/31/1931
Marshall - Longwood - Arsenal Hill - Longwood - Lieberman 138KV Line (TX Section) : SEP : TL244	TL244	SEP	1926	12/31/1926
Marthaville - Robeline 69kv Line : SEP : TL358	TL358	SEP	2012	4/18/2012
Mena - Dequeen - Nashville - Narrows Dam/Tap - Murfreesboro 69KV Line : SEP : TL152	TL152	SEP	1951	12/31/1951
Mena - Murfreesboro including Loop - Dierks 69KV Line : SEP : TL167	TL167	SEP	1968	12/31/1968
Midland - Huntington - REA - Booneville - Branch/Tap - Magazine - North Magazine 69KV Line : SEP : TL162	TL162	SEP	1928	12/31/1928
Minden Road Tee - Whitehurst - Bodcau - Red Point 138KV Line : SEP : TL119	TL119	SEP	1953	12/31/1953
Mineola - Gladewater/tap - Gulf Pump Station 69KV Line : SEP : TL211	TL211	SEP	1925	12/31/1925
Mineola - Grand Saline - Westwood - Quitman 69KV Line : SEP : TL214	TL214	SEP	1926	12/31/1926
Mt Pleasant - Mineola/Taps - Magnolia Pump Station, Mt Vernon, & Petty 69KV Line : SEP : TL212	TL212	SEP	1931	12/31/1931
Mt Pleasant - Pittsburg - Gilmer/Tap - Henderson Manufacturing Company 69KV Line : SEP : TL218	TL218	SEP	1926	12/31/1926
N Leesville - Hornbeck 69kv Line : SEP : TL352	TL352	SEP	2010	10/2/2010
North Magazine - Danville (Entergy) 161kv Line : SEP : TL337	TL337	SEP	2008	12/3/2008
Northwest Texarkana - Northeast Texarkana (Sugarhill) 138KV Line (TX section) : SEP : TL235	TL235	SEP	1983	12/31/1983
Northwest Texarkana - Patterson (AR portion) : SEP : TL181	TL181	SEP	1942	12/31/1942
Okay - AP&L Co Interconnect near McKnight 115KV Line : SEP : TL171	TL171	SEP	1929	12/31/1929

**SWEPCo Transmission
Line In-Service Dates**

Okay - Patterson 138KV Line : SEP : TL326	TL326	SEP	1929	12/31/1929
Patterson - Foreman - Dequeen/Tap - Magnolia Pump Station 69KV Line : SEP : TL155	TL155	SEP	1929	12/31/1929
Patterson - Wilkes Plant 138KV Line : SEP : TL246	TL246	SEP	1959	12/31/1959
Pittsburg - Winnsboro 69KV Line : SEP : TL229	TL229	SEP	1967	12/31/1967
Poynter - Evenside 69KV Line : SEP : TL231	TL231	SEP	1969	12/31/1969
Robson Road (POD) - Bayou Pierre - Kingston 69kv Line : SEP : TL354	TL354	SEP	2010	10/2/2010
Shreveport 138KV Loop 138KV Line : SEP : TL110	TL110	SEP	1972	12/31/1972
Shreveport 69KV Loop : SEP : TL114	TL114	SEP	1943	12/31/1943
Siloam Springs - Prairie Grove - Greenland 69KV (AR portion) : SEP : TL164	TL164	SEP	1930	12/31/1930
Siloam Springs - West Siloam Springs (GRDA) 161KV Line : SEP : TL172	TL172	SEP	1949	12/31/1949
Siloam Springs, AR - Clarksville, Oklahoma 345KV Line : SEP : TL251	TL251	SEP	2002	7/1/2000
South Dierks - Dierks Substation 69KV Line : SEP : TL160	TL160	SEP	1972	12/31/1972
South Dierks - Patterson Substation 138KV Line : SEP : TL184	TL184	SEP	1969	12/31/1969
South Fayetteville - South Springdale - Dyess 161KV Line : SEP : TL190	TL190	SEP	1973	12/31/1973
South Shreveport - Frnerson (Cleco Interconnection) 138KV Line : SEP : TL131	TL131	SEP	1952	12/31/1952
South Shreveport - West Electric - SW Shreveport - Flournoy - Longwood 138KV Line : SEP : TL130	TL130	SEP	1955	12/31/1955
Southwest Shreveport-Diana-Welsh 345KV Line (LA Portion) : SEP : TL134	TL134	SEP	1958	12/31/1958
Southwest Shreveport-Diana-Welsh 345KV Line (TX Portion) : SEP : TL272	TL272	SEP	1976	12/31/1976
Summer Grove - Flournoy - Waskom - REA & Bingham Pump Plant 69KV Line (LA portion) : SEP : TL120	TL120	SEP	1955	12/31/1955
Texarkana Plant - Bann - De Kalb - Mt Pleasant/taps 69KV Line (TX Portion) : SEP : TL213	TL213	SEP	1941	12/31/1941
Texarkana Plant - Washington St - 12th St - Patterson/tap - Co-Oper Tire 69KV Line : SEP : TL158	TL158	SEP	1926	12/31/1926
Turk - Northwest Texarkana 345KV Line (AR Portion) : SEP : TL327	TL327	SEP	2012	8/28/2012
Turk - Northwest Texarkana 345KV Line (TX Portion) : SEP : TL328	TL328	SEP	2012	8/28/2012
Turk - Southeast Texarkana 138KV Line : SEP : TL330	TL330	SEP	2012	3/12/2012
Turnertown - Overton - Poynter - Beckville - Marshall/tap 69KV Line : SEP : TL215	TL215	SEP	1931	12/31/1931
Valliant - Northwest Texarkana 345KV Line (TX Portion) : SEP : TL90928	TL90928	SEP	2012	6/25/2012
VBI - Rogers/Loop Thru Springdale & Tap - SEFOR Project 69KV Line : SEP : TL154	TL154	SEP	1929	12/31/1929
Waskom - Karnack 69KV Line : SEP : TL225	TL225	SEP	1965	12/31/1965
Welsh - Northwest Texarkana 345KV Line : SEP : TL274	TL274	SEP	1981	12/31/1981
Welsh HVDC Substation - Monticello 345KV Line : SEP : TL199	TL199	SEP	1995	12/31/1995
Western Electric Tee - Logansport - Texas Station 138KV Line : SEP : TL107	TL107	SEP	1948	12/31/1948
Whitney - Piller - Diana - Lone Star South 138KV Line : SEP : TL249	TL249	SEP	1953	12/31/1953
Wilkes Plant - Jefferson Switching Station (South of Line 247) 138KV Line : SEP : TL240	TL240	SEP	1969	12/31/1969
Wilkes Plant - Jefferson Switching Station 138KV Line : SEP : TL247	TL247	SEP	1961	12/31/1961
Wilkes Plant - Petty 138KV Line : SEP : TL250	TL250	SEP	1969	12/31/1969
Winnsboro - N. Mineola 138KV Line : SEP : TL287	TL287	SEP	2006	4/1/2006

Note 1: Retired; rebuilt as 161kV TL388in 2018. Land & ROW originally acquired 1949-1954